

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SAUL SANTIAGO,

Plaintiff,

Docket No.: 08CV3005(PAC-JCF)

**INITIAL DISCLOSURE**

-against-

JM HEAFORD LIMITED and  
JM HEAFORD, INC.,

Defendants.  
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Defendant, JM HEAFORD, INC., by and through their attorneys, CASCONE &  
KLUEPFEL, LLP, as and for Initial Disclosures, states as follows:

A. At this time, defendant is unaware of any witnesses that may testify at trial other than the parties involved. Defendant will supplement this response if and when new witnesses become known;

B. Defendant does not possess any accident and/or incident reports or any other documents relating to this accident;

C. Plaintiffs have the burden of giving a detailed computation of damages;

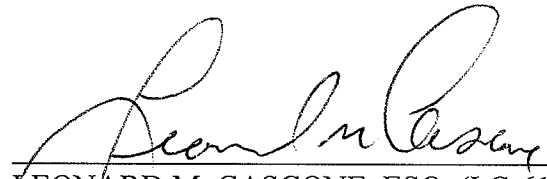
D. At the time of the accident, defendant was insured by Selective Insurance with policy limits of \$1,000,000.00.

Defendant also maintained an Umbrella Policy with limits of \$1,000,000.00.

E. At this time we have not designated expert witnesses.

Dated: Garden City, New York  
April 14, 2008

By:

  
LEONARD M. CASCONI, ESQ. (LC-6123)  
CASCONI & KLUEPFEL, LLP  
Attorneys for Defendant  
JM HEAFORD, INC.  
1399 Franklin Avenue, Suite 302  
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TO: GALVANO & XANTHAKIS  
Attorneys for Plaintiff  
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JM HEAFORD LIMITED  
570 Lexington Avenue  
New York, New York 10022  
(212) 697-6555

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**INITIAL DISCLOSURE**

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**CASCONE & KLUEPFEL, LLP.**  
*Attorneys for Defendant – JM HEAFORD, INC.*  
*Office and Post Office Address, Telephone*  
**1399 Franklin Avenue**  
**Suite 302**  
**Garden City, New York 11530**  
**(516) 747-1990**

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**To: ALL COUNSEL**

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**Service of a copy of the within  
is hereby admitted,  
Dated,**

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**Attorney(s) for Defendant – JM HEAFORD, INC.**

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